



# California Regional Water Quality Control Board

## Los Angeles Region



Linda S. Adams  
Cal/EPA Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger  
Governor

August 24, 2010

Mr. Mahesh Vidyasagar  
ExxonMobil Environmental Services  
ExxonMobil Production Company  
12450 Greenspoint Drive  
GSC-GP6-1004  
Houston, Texas 77060

Certified Mail  
Return Receipt Requested  
Claim No. 7009 0820 0001 6811 9558

**CALIFORNIA WATER CODE SECTION 13267 ORDER: REQUIRING SUBMITTAL OF TECHNICAL REPORTS – FORMER EXXONMOBIL JALK FEE PROPERTY, 10607 NORWALK BOULEVARD, SANTA FE SPRINGS, CALIFORNIA (SCP NO. 0203, SITE ID NO. 1848000)**

Dear Mr. Vidyasagar:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the State regulatory agency responsible for protecting water quality in Los Angeles and Ventura Counties. To accomplish this, the Regional Board issues investigative orders authorized by the Porter-Cologne Water Quality Control Act (California Water Code [CWC], Division 7). Enclosed is a Regional Board Order (Order) requiring submittal of technical reports pursuant to CWC section 13267. The Order requires submittal of technical reports for the lateral and vertical delineation of groundwater contamination originating from the site.

Following review of the *2009 Annual Groundwater Report & Closure Request*, dated October 27, 2009, Regional Board staff held a meeting with you and your environmental consultant to discuss groundwater closure related issues on March 16, 2010. Based on the meeting discussion, the Regional Board issued a letter dated March 30, 2010 (enclosed) stating the reasons for not granting groundwater closure and requesting the submittal of a work plan for further delineation of groundwater contamination from releases at the site. At your request, the initial due date for the work plan was extended to July 30, 2010. By the extended due date of July 30, 2010, the Regional Board had not received the requested work plan for additional groundwater investigation. Instead, the Regional Board received the *Response to CRWQCB-LAR Directive Letter*, dated July 30, 2010, prepared and submitted on your behalf by Environmental Resolutions, Inc. (ERI).

In the July 30, 2010 letter, ERI stated that the source of the chlorinated volatile organic compounds (VOCs) in soil along the southeastern property boundary was from the Continental Heat Treating (CHT) facility, that chlorinated VOCs in groundwater originated from both the CHT facility and the regional Omega Chemical Superfund area, and that corrective action regarding the residual chlorinated VOCs detected on both the former Jalk Fee property and CHT facility should be directed to the responsible party of the CHT facility. Therefore, ERI requested that the Regional Board's March 30, 2010 directive requiring ExxonMobil to conduct additional groundwater assessment be rescinded.

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Mr. Mahesh Vidyasagar  
ExxonMobil Environmental Services  
SCP No. 0203

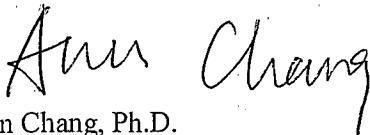
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August 24, 2010

Based on review of your July 30, 2010 letter, Regional Board staff have not identified any new information indicating that additional investigations for groundwater contamination originating from the subject site are not needed. Therefore, the Regional Board stands by the previous determination that you are required to submit technical reports to adequately delineate the lateral and vertical extent of groundwater contamination from releases at the site.

If you have any questions, please contact me at (213) 620-6070 or [achang@waterboards.ca.gov](mailto:achang@waterboards.ca.gov).

Sincerely,

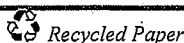


Ann Chang, Ph.D.  
Water Resource Control Engineer  
Site Cleanup Unit I

Enclosures:    1. Regional Board CWC section 13267 Order dated August 27, 2010  
                     2. Regional Board letter dated March 30, 2010

cc:                James Anderson, Environmental Resolutions, Inc.  
                     Richard N. Racouillat, Law Offices, 1301 Chorro Street, San Luis Obispo, CA 93401  
                     Michelle F. Smith, 10629 Norwalk Boulevard, Santa Fe Springs, CA 90670  
                     Thomas Clark, Coast Aluminum and Architectural Inc., 10628 Fulton Wells Avenue,  
                     Santa Fe Springs, CA 90670  
                     William Macnider, CSI Electric Contractors, 10623 Fulton Wells Avenue, Santa Fe  
                     Springs, CA 90670.

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Arnold Schwarzenegger  
Governor

### REQUIRING SUBMITTAL OF TECHNICAL REPORTS (CALIFORNIA WATER CODE SECTION 13267 ORDER)

#### DIRECTED TO EXXONMOBIL PRODUCTION COMPANY

FORMER EXXONMOBIL JALK FEE PROPERTY  
10607 NORWALK BOULEVARD, SANTA FE SPRINGS, CALIFORNIA  
(SCP NO. 0203, SITE ID NO. 1848000)

**You are legally obligated to respond to this Order. Please read this carefully.**

Pursuant to section 13267(b) of the California Water Code (CWC), you are hereby directed to submit the following:

1. By **November 1, 2010**, you are required to submit the first work plan for further groundwater investigation to adequately delineate the lateral and vertical extent of groundwater contamination from releases at the site. Additional multiple-depth groundwater monitoring wells shall be installed at the identified on-site source (soil contamination) areas and in the upgradient, crossgradient, and downgradient directions.

Following the approval of the required first work plan, additional groundwater investigation(s) shall be conducted until the lateral and vertical extent of the groundwater contamination originating from the site is adequately defined. A report or reports documenting the results of the required investigation(s) shall be submitted by the due date(s) specified in the work plan approval or report review comment letter(s) or other correspondences from the Regional Board.

2. Following the installation of the new groundwater monitoring wells, monitoring and sampling of all existing and new groundwater monitoring wells shall be conducted on a semi-annual basis. The semi-annual groundwater monitoring reports shall be submitted according to the following schedule, with the next report due by **August 15, 2011**:

<u>Monitoring Period</u>	<u>Report Due Date</u>
May	August 15
November	February 15

Pursuant to section 13268(b)(1) of the CWC, failure to submit the required technical reports described above may result in the imposition of civil liability penalties by the Regional Board in an amount up to one thousand dollars (\$1,000) for each day each technical report is not received after the above due date.

The Regional Board needs the technical information in order to determine the lateral and vertical extent of groundwater contamination from on-site releases of chlorinated volatile organic compounds (VOCs). You are being required to submit the technical reports based on the following justifications:

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- A. Site soil data collected to date have not indicated that detected chlorinated VOC contamination in soil at the southern portion of the site is completely from the release of chlorinated solvents at the adjacent property, occupied by the Continental Heat Treating (CHT) facility. Similar to ExxonMobil's claim, CHT claims that soil contamination encountered at the CHT facility is from the release of petroleum hydrocarbons and chlorinated VOCs at the former Jalk Fee property.
- B. Based on the results of historical soil assessment, tetrachloroethene (PCE) was detected at concentrations up to 42,000 micrograms per kilogram ( $\mu\text{g/kg}$ ) in soil borings at sampled depths ranging from 5 to 61 feet below ground surface (bgs) across the southern portion of the site. Chlorinated VOCs concentrations detected throughout the sampled soil indicate the on-site release of chlorinated VOCs to the subsurface, which have impacted soil and groundwater beneath the site. Review of the soil boring logs (HS-1 through HS-4) indicates that depth to groundwater was approximately 61.5 feet bgs when the 61-foot soil samples were collected in July 1997.
- C. Previous remedial excavation activities were conducted to remove chlorinated VOCs impacted soil to a depth of approximately 15 feet bgs only. Known residual cis-1,2-dichloroethene (DCE) and PCE contamination in soil remains at concentrations up to 2,000  $\mu\text{g/kg}$  and 1,400  $\mu\text{g/kg}$ , respectively, between 15 feet and 61 feet bgs. The residual chlorinated VOCs may act as a continuing source of groundwater contamination beneath the subject site and vicinity.
- D. During the last 7 years of annual groundwater monitoring, PCE and trichloroethene (TCE) were detected in monitoring well MMW-5 at concentrations up to 660 micrograms per liter ( $\mu\text{g/L}$ ) and 190  $\mu\text{g/L}$ , respectively. Monitoring well MMW-5 is located crossgradient from and adjacent to one identified on-site soil contamination area.
- E. The site is located within the United States Environmental Protection Agency (USEPA) Omega Superfund Site groundwater plume boundaries. The Remedial Investigation and Feasibility Study have been completed for the Omega Superfund Site. Currently, the USEPA has proposed remedial alternatives to contain the approximately 4.5 miles long plume of contaminated groundwater within the Omega Superfund Site boundaries.
- F. Based on the groundwater sampling data obtained to date, the USEPA has determined that groundwater quality in the area of the site has been impacted by chlorinated VOCs released from multiple sources, including the subject site and the CHT facility at the adjacent property to the south. To characterize groundwater contamination and to minimize continuing contribution from identified and suspected source areas, USEPA has requested the Regional Board to require all identified or suspected responsible parties to conduct additional subsurface investigations and/or remediation at their sites.
- G. On May 5, 2010, the Regional Board issued a CWC section 13267 Order, requiring CHT to prepare and submit technical report(s) for the lateral and vertical delineation of impacted soil, soil-gas, and groundwater at and in the vicinity of the CHT facility.

August 24, 2010

- H. There are no groundwater monitoring wells, upgradient, crossgradient to the east and southeast, and downgradient, from the identified on-site area of soil contaminated with chlorinated VOCs. Existing monitoring wells MMW-4 and MMW-5 are not adequate to monitor the magnitude and configuration of the groundwater chlorinated VOCs plume originating from the identified on-site soil contamination area. Therefore, additional groundwater investigations are needed to adequately delineate the lateral and vertical extent of groundwater contamination originating from the identified soil contamination area at the site.


We believe that the burdens, including costs, of these reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. If you disagree and have information about the burdens, including costs, of complying with these requirements, provide such information to Dr. Ann Chang within 10 days of the date of this Order so that we may reconsider the requirements.

All future technical reports required pursuant to the CWC section 13267 Orders shall contain the following completed perjury statement. The perjury statement shall be signed by a senior authorized [NAME OF RESPONSIBLE PARTY'S or DISCHARGER'S COMPANY] representative (and not by a consultant). It shall be in the following format:

"I [NAME], do hereby declare, under penalty of perjury under the laws of the State of California, that I am [JOB TITLE] for [NAME OF RESPONSIBLE PARTY\DISCHARGER], that I am authorized to attest to the veracity of the information contained in the reports described herein, and that the information contained in [NAME AND DATE OF REPORT] is true and correct, and that this declaration was executed at [PLACE], [STATE], on [DATE]."

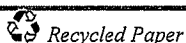
Any person aggrieved by this action of the Regional Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: [http://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality](http://www.waterboards.ca.gov/public_notices/petitions/water_quality) or will be provided upon request.

SO ORDERED.

  
Samuel Unger, P.E.  
Interim Executive Officer

August 24, 2010

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Arnold Schwarzenegger  
Governor

March 30, 2010

Mr. Mahesh Vidyasagar  
ExxonMobil Environmental Services  
12450 Greenspoint Drive  
GSC-GP6-1004  
Houston, Texas 77060

**RESPONSE TO REQUEST FOR GROUNDWATER CLOSURE – EXXONMOBIL FORMER  
JALK FEE PROPERTY, 10607 NORWALK BOULEVARD, SANTA FE SPRINGS,  
CALIFORNIA (SCP NO. 0203, SITE ID NO. 1848000)**

Dear Mr. Vidyasagar:

Los Angeles Regional Water Quality Control Board (Regional Board) staff have received and reviewed the 2009 *Annual Groundwater Monitoring Report and Closure Request* (Report), dated October 27, 2009, prepared by Arcadis for the reference site. In addition, Regional Board staff held a meeting with representatives of ExxonMobil Environmental Services Company (ExxonMobil) and Environmental Resolutions (new consultant) on March 16, 2010, to discuss groundwater closure related issues.

The site is approximately 8.8 acres in size and redeveloped into an industrial park in 2003, following soil remediation activities. The site had been used for oil production activities from the 1920s to the 1990s. The abandonment and removal of oil wells, pipelines, and a tank farm were conducted in 2000. Historical site assessment activities indicated that soil was impacted with petroleum hydrocarbons and halogenated volatile organic compounds (HVOCs). Following remedial excavation of petroleum hydrocarbons and chlorinated solvent contaminated soils to depths up to 24 feet below ground surface (bgs), the site was granted soil closure by the Regional Board in the letters dated March 1, 1999 and March 5, 2001, to promote the site redevelopment.

Three groundwater monitoring wells (MMW-3, MMW-4, and MMW-5) were installed at the site in 1994 as part of requirements for on-site land treatment of petroleum hydrocarbons impacted soil. Monitoring well MMW-3 was abandoned in 2001. The primary contaminants of concern in groundwater beneath the site are HVOCs, including tetrachloroethylene (PCE) and trichloroethylene (TCE). During the last 9 years of groundwater monitoring, PCE and TCE were detected at concentrations up to 660 micrograms per liter ( $\mu\text{g/L}$ ) and 190  $\mu\text{g/L}$ , respectively, in monitoring well MMW-5. Monitoring well MMW-5 is located crossgradient from and adjacent to the identified on-site soil contamination area. Based on the evaluation of 9 years of post soil closure groundwater monitoring data, Arcadis, on behalf of ExxonMobil, requested groundwater closure for the subject site.

Based on our review of the Report and file documents, Regional Board staff have determined that groundwater closure at the site can not be granted at this time for the following reasons:

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March 30, 2010

1. Based on the results of historical soil assessment, HVOCs were detected at concentrations up to 42,000 micrograms per kilogram ( $\mu\text{g/kg}$ ) in soil borings at depths ranging from 5 to 35 feet bgs across the southern portion of the site. Detectable HVOCs concentrations throughout the sampled soil columns suggest on-site releases of HVOCs to groundwater beneath the site.
2. Previous remedial excavation activities were conducted to remove HVOCs impacted soil to a depth of approximately 15 feet bgs only. Residual HVOCs contamination in soil remains at concentrations up to 1,400  $\mu\text{g/kg}$  between 15 feet and 35 feet bgs. The residual HVOCs may act as a continuing source of groundwater contamination beneath the site and vicinity.
3. There are no groundwater monitoring wells, upgradient, crossgradient to the east and southeast, and downgradient, from the identified on-site area of soil contamination, located at the southern portion of the site. Existing monitoring wells MMW-4 and MMW-5 are not adequate to monitor the magnitude and configuration of the HVOCs plume in groundwater originating/contributing from the on-site source area.
4. To adequately delineate the lateral and vertical extent of groundwater contamination from releases at the site, please submit a work plan for further groundwater investigation to the Regional Board by **July 1, 2010**. Additional monitoring wells shall be screened at multiple depths and installed at the identified source areas and in the upgradient, crossgradient, and downgradient directions.
5. Pursuant to Division 7 of the Porter Cologne Water Quality Control Act under section 13307.1, the Regional Board is required to notify all current fee title holders for the subject site prior to considering corrective action or granting case closure. Therefore, you are required to provide the name, mailing address and telephone number for all record fee title holders for the site together with a copy of the county record of current ownership, available from the County Recorder's Office, or you may complete the attached Certification Declaration Form and submit it to the Regional Board by **July 1, 2010**.

If you have any questions, please contact Dr. Ann Chang at (213) 620-6070 or [achang@waterboards.ca.gov](mailto:achang@waterboards.ca.gov).

Sincerely,

  
Tracy V. Egoscue  
Executive Officer

Attachment: Certification Declaration Form

cc: James Anderson, Environmental Resolutions, Inc.

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